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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

STEVE WYNN, an individual,

Plaintiff,

v.

LISA BLOOM, an individual; and THE  
BLOOM FIRM, a California Professional  
Corporation,

Defendants.

Case No.: 2:18-cv-00609-JCM-NJK

**STIPULATION AND ORDER  
TO EXTEND DEADLINE SET FORTH IN  
ORDER RE: COMPLETION OF  
AUTHORIZED DISCOVERY AND  
BRIEFING SCHEDULE ON RENEWED  
ANTI-SLAPP MOTION [ECF NO. 49]**

**[First Request]**

Plaintiff Steve Wynn ("**Mr. Wynn**"), by and through his attorneys of record, Tamara Beatty Peterson, Esq. and Nikki L. Baker, Esq., of Peterson Baker, PLLC, and L. Lin Wood, Esq., Nicole Jennings Wade, Esq., Jonathan D. Grunberg, Esq., and G. Taylor Wilson, Esq., of L. Lin Wood, P.C., and Defendants Lisa Bloom and The Bloom Firm (collectively, the "**Bloom Defendants**"), by and through their attorneys of record, Marc J. Randazza, Esq., Ronald D. Green, Esq., and Alex

1 J. Shepard, Esq., of the Randazza Legal Group, PLLC, hereby agree and stipulate, subject to the  
2 Court's approval, as follows:

3 1. On May 5, 2019, the Court entered an order granting, in part, and denying, in part,  
4 Mr. Wynn's Motion for Discovery to Respond to Defendants' Special Motion to Dismiss Pursuant  
5 to NRS 41.660 (the "**Discovery Order**"). *See* ECF No. 45.

6 2. In the Discovery Order, the Court ordered the Parties to "submit a proposed schedule  
7 for completion of the authorized discovery, together with a briefing schedule on Defendants'  
8 Renewed Motion to Dismiss Pursuant to NRS 41.660 (ECF No. 36)." *See* ECF No. 45 at 11:2-4.

9 3. On May 17, 2019, the Court entered an Order approving the proposed stipulation of  
10 the Parties, which set forth deadlines for completion of discovery and a briefing schedule. *See* ECF  
11 No. 49.

12 4. Among other deadlines, the Order stated that "Mr. Wynn shall file and serve his  
13 response in opposition to the Renewed anti-SLAPP Motion on or before twenty-one (21) days  
14 following the completion of the above-described discovery, and in any event no later than August  
15 30, 2019," and that "[t]he Bloom Defendants shall file and serve their reply in support of the  
16 Renewed anti-SLAPP Motion fourteen (14) days after service of Mr. Wynn's response." (*Id.* at ¶7).

17 5. Mr. Wynn requested, and the Bloom Defendants agreed to, a short extension of the  
18 above briefing deadlines in order to accommodate the schedule of Mr. Wynn's counsel. Mr. Wynn,  
19 in turn, proposed to the Bloom Defendants that they may have additional time to file and serve their  
20 reply brief.

21 6. The Parties agree and propose that the deadlines be extended for the Renewed anti-  
22 SLAPP Motion as follows:

23 a. Mr. Wynn shall file and serve his response in opposition to the Renewed  
24 anti-SLAPP Motion on or before September 13, 2019; and

25 b. The Bloom Defendants shall file and serve their reply in support of the  
26 Renewed anti-SLAPP Motion on or before October 11, 2019.

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7. The Parties respectfully submit that good cause exists for the Court to approve this Stipulation.

Respectfully submitted this 15<sup>th</sup> day of August, 2019.

PETERSON BAKER, PLLC

RANDAZZA LEGAL GROUP, PLLC

By: /s/ Nikki L. Baker

By: /s/ Marc J. Randazza

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and The Bloom Firm*

*Attorneys for Plaintiff Steve Wynn*

IT IS SO ORDERED.

  
UNITED STATES DISTRICT JUDGE

August 20, 2019

DATED: \_\_\_\_\_